



*Consulting Engineers
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June 13, 2006
(PBW Project No. 1259)

VIA ELECTRONIC MAIL

Mr. Gary Miller
Superfund Division, Region 6 (6SF-AP)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: May 2006 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO and the Statement of Work (SOW) attached thereto). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - Obtained the remaining outstanding access agreements for properties immediately adjacent to the north and northeast of the Site (relative to Site property north of Marlin Avenue) and west of the Site (relative to Site property south of Marlin Avenue) (UAO Paragraph 72).
 - Remedial Investigation/Feasibility Study (RI/FS) Work Plan and Sampling and Analysis Plan (SAP) were approved on May 4, 2006, contingent on replacement pages for the RI/FS Work Plan and SAP that were submitted to the EPA on May 16, 2006.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No data were received or generated during the previous month.

3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
- Upgrade the existing fencing system at the Site south of Marlin Avenue, planned for the week of June 19, 2006.
 - Initiation of RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan (weather permitting):
 - Subtask 6.1 – Former impoundment cap evaluation activities are planned for July 2006;
 - Subtask 6.2 – Surface geophysical survey is planned for the week of June 26, 2006;
 - Subtask 6.3 – Soil sampling activities are planned for July 2006;
 - Subtask 6.4 – Water well survey is planned for July 2006;
 - Subtask 6.5 – Groundwater investigation activities are planned for July and August 2006; and
 - Subtask 6.6 and 6.7 - Surface water and sediment sampling of the Intracoastal Waterway (including background samples) is planned for the week of June 19, 2006; on-site/off-site surface water and sediment sampling is planned for July 2006.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – The scope of activities to be performed as part of the RI/FS will be initiated in late June and early July. At this time, no delays in the general schedule listed above are anticipated. However, the schedule for site characterization activities will be dependent on weather conditions at the Site.

Thank you for the opportunity to submit this status report. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

A handwritten signature in black ink, appearing to read 'Eric F. Pastor', with a stylized flourish at the end.

Eric F. Pastor, P.E.
Principal Engineer

cc: Mr. Brent Murray - Sequa Corporation
Mr. Rob Rouse - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morris III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP